

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 22-11127</b>
<b>Roy Turner</b>	:	<b>Chapter 13</b>
	:	<b>Judge Magdeline D. Coleman</b>
<b>Debtor(s).</b>	:	<b>*****</b>
<b>Roy Turner, Kenneth E. West</b>	:	
<b>Movant</b>	:	<b>Related to Document No. 75</b>
<b>v.</b>	:	
	:	
<b>JPMorgan Chase Bank, National</b>	:	
<b>Association</b>	:	
<b>Respondent</b>	:	

**RESPONSE TO MOTION TO SELL (DOCKET # 75)**

Now comes JPMorgan Chase Bank, National Association ("Creditor") by and through its attorneys, Manley Deas Kochalski LLC, and responds to the Motion to Sell filed by Roy Turner ("Debtor") on December 6, 2023 at Docket # 75. Creditor states that Debtor's motion proposes to treat Creditor's claim unfairly by either failing to list the current amount due to pay Creditor's claim in full or by proposing a sale price insufficient to satisfy Creditor's lien.

Creditor does not oppose the Motion if:

1. Creditors loan is paid in full.
2. Debtor's counsel requests a payoff quote from Creditor to ensure its lien is paid no sooner than 7 days prior to closing.
3. If Creditor's lien is not paid in full, any short sale shall be contingent on written approval from Creditor.
4. The sale shall occur no more than 120 days from the date the order is entered.

5. If the sale is later than 120 days from the date the order is entered, Debtor shall file a new motion with the court with updated terms of sale.

WHEREFORE, Creditor respectfully requests that a hearing be set on the matter and that the motion be denied.

Respectfully submitted,

/s/Alyk L. Oflazian

Alyk L. Oflazian, Esquire (312912)

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Attorneys for Creditor

The case attorney for this file is Alyk L. Oflazian.

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**Roy Turner, Kenneth E. West** :  
**Movant** : **Related to Document No. 75**

**V.**

**JPMorgan Chase Bank, National Association**

## Respondent

## CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Response to Motion to Sell was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, [ecfemails@ph13trustee.com](mailto:ecfemails@ph13trustee.com)

Brad J. Sadek, Attorney for Roy Turner, brad@sadeklaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S.

Mail to the following:

Roy Turner, 185 Nix Court, Fayetteville, GA 30214

Cobblestone at Chestnut Hill Condo Assoc, c/o Glenn Ross, Esq., 630A Germantown Pike,  
Lafayette Hill, PA 19444

/s/Alyk L. Oflazian